

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK RATIONALIZATION  
SERVICE CHANGES, 2012

Docket No. N2012-1

NEWSPAPER ASSOCIATION OF AMERICA  
INTERROGATORIES TO UNITED STATES POSTAL SERVICE  
WITNESS FRANK NERI (USPS-T-4) (NAA/USPS-T4-1-3)  
(January 11, 2012)

The Newspaper Association of America ("NAA") hereby, and pursuant to rule 26 of the Commission's rules of practice, respectfully submits the following interrogatories, numbered (NAA/USPS-T4-1-3) to United States Postal Service witness Frank Neri (USPS-T-4) and requests a timely answer under oath. If an interrogatory can be more accurately answered by a different witness, please redirect to the appropriate witness.

Please contact the undersigned with any questions.

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Certificate of Service

I hereby certify that I have this 11<sup>th</sup> day of January, 2012, caused to be served the foregoing document upon the United States Postal Service and the Public Representative in accordance with sections 12 and 20(c) of the rules of practice.

William B. Baker  
William B. Baker

NEWSPAPER ASSOCIATION OF AMERICA  
INTERROGATORIES TO UNITED STATES POSTAL SERVICE  
WITNESS FRANK NERI (NAA/USPS-T4-1-3)

NAA/USPS-T4-1: Please refer to page 3 of your testimony, lines 2 through 8. At which categories of the mail processing facilities listed there may Periodicals mailers obtain a destination entry discount? What discount(s) would be available?

NAA/USPS-T4-2: Assuming that the mail processing network is rationalized as generally described by the Postal Service in this proceeding and service standards for First-Class and Periodicals Mail are revised as proposed, please explain whether those changes would have any effect on processing of Standard Mail flats on FSS equipment. In particular, would you expect a larger proportion, a smaller proportion, or no change in the proportion of Standard Mail flats to receive FSS processing?

NAA/USPS-T4-3: Does your answer to NAA/USPS-T4-2 vary depending upon whether the Standard flats mailing is entered at:

- a. A destination delivery unit?
- b. A facility at which it can receive an SCF discount?
- c. A facility at which it receives no dropship discount?